

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FILED

CJ
law

AUG 26 2008
AUG 26 2008

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

John E. Taylor, Jr.
Plaintiff(s) **v.**)
)
Dr. Eileen Couture,)
)
Dr. Ann Marie Dunlap,)
)
Cook County Cermak Health
Defendant(s) **Services.)**

Case Number: _____

Judge _____

MOTION FOR APPOINTMENT OF COUNSEL

1. I, John E. Taylor, Jr., declare that I am the (check appropriate box): ☐ plaintiff
☐ defendant in the above-entitled proceeding and state that I am unable to afford the services of an attorney,
and hereby request the Court to appoint counsel to represent me in this proceeding.
2. In support of my motion, I declare that I have made the following attempts to retain counsel to represent me
in this proceeding:
3. In further support of my motion, I declare that (check the appropriate box):
 - ☐ I am not currently, nor previously have been, represented by an attorney appointed by the Court in this or
any other civil or criminal proceeding before this Court.
 - ☐ I am currently, or previously have been, represented by an attorney appointed by this Court in the
proceeding(s) described on the back of this page.
4. In further support of my motion, I declare that (check appropriate box):
 - ☐ I have attached an original Application to Proceed In Forma Pauperis in this proceeding detailing my
financial status.
 - ☐ I have previously filed an Application to Proceed In Forma Pauperis in this proceeding and it is a true and
correct representation of my financial status.
 - ☐ I have previously filed an Application to Proceed In Forma Pauperis in this proceeding; however, my
financial status has changed and I have attached an amended Application to Proceed In Forma Pauperis to
reflect my current financial status.
5. I declare under penalty that the foregoing is true and correct.

**08CV4871
JUDGE ST. EVE
MAGISTRATE JUDGE MASON**

John E. Taylor, Jr.
Movant's Signature

P.O. Box 711
Street Address

Menard, IL 62259-0711
City/State/Zip

Date: 8/12/08

As indicated in paragraph three on the opposite page, I am currently, or previously have been, represented by an attorney appointed by this Court in the following civil or criminal action(s):

Assigned Judge Amy St. Eve	Case Number 06 CV 2208
Case Title	
Appointed Attorney's Name Atty. Erin Kelly & Atty. Julie Weber	
<input type="checkbox"/> If case is still pending, please check box.	

Assigned Judge	Case Number
Case Title	
Appointed Attorney's Name	
<input type="checkbox"/> If case is still pending, please check box.	

Assigned Judge	Case Number
Case Title	
Appointed Attorney's Name	
<input type="checkbox"/> If case is still pending, please check box.	

Assigned Judge	Case Number
Case Title	
Appointed Attorney's Name	
<input type="checkbox"/> If case is still pending, please check box.	

The plaintiff is appealing to the court for appointment to counsel because of his past experiences of Civil Suit for which he needed an attorney to represent him.

The plaintiff is desiring a jury trial if some type of reasonable settlement is not offered by the State's Attorney. The plaintiff will need an attorney to help him negotiate a settlement, and to represent his best interest in court appearances.

Attached to this motion are letters the plaintiff has written to five lawyers seeking their representation on his complaint, but none of them have responded.

Copy

To: Thomas Young, Attorney
Kirkland & Ellis, LLP
200 E. Randolph Dr.
Chicago, IL 60601

From: John E. Taylor, Jr., R-66376
Menard Correctional Center
P.O. Box 711
Menard, IL 62559

Dear *Atty. Young*

July 31, 2008

I am in need of legal representation for a §1983 Civil suit against Cook County Health Services (Cermak Health Services) and the employees who were involved in denying medication each time I went to Court, and/or Stroger's Hospital.

According to what a lawyer told me, my Fourteenth Amendment: Due Process rights and First Amendment right to petition, were violated, due to the discovery of a pending Civil suit at the time of contact of a doctor.

I have resolved all the jail's Administration remedies and am ready to pursue legal actions due to the violation of my Civil/Constitutional rights.

My previous Civil lawyer took my last case based upon a percentage of the award or settlement, plus expenses. Based upon case law, and a previous settlement, my rights were violated. I hope you and your Firm will represent me for a §1983 Civil suit.

If you would like to discuss more details about possible representation, you can call the prison and let them know you would like to set up a collect phone call for the possibility of representation. (Julie Potts 618-826-5071 at Administration).

Thankyou for any consideration given. If you can't represent me, will you please recommend someone who may be willing to represent me.

Sincerely,

John E. Taylor

Copy

To: Edward G. Zaknoen, Attorney
Zaknoen & Zaknoen
161 N. Clark St. Ste. 4700
Chicago, IL 60601-3201

From: John E. Taylor, Jr., R-66376
Menard Correctional Center
P.O. Box 711
Menard, IL 62559

Dear ~~Atty.~~ Zaknoen

July 31, 2008

I am in need of legal representation for a \$1983 Civil suit against Cook County Health Services (Cermak Health Services) and the employees who were involved in denying medication each time I went to Court, and/or Stroger's Hospital.

According to what a lawyer told me, my Fourteenth Amendment: Due Process rights and First Amendment right to petition, were violated, due to the discovery of a pending Civil suit at the time of contact of a doctor.

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Thankyou for any consideration given. If you can't represent me, will you please recommend someone who may be willing to represent me.

Sincerely,

John E. Taylor

Copy

To: Richard W. Porter, Attorney
Kirkland & Ellis, LLP
200 E. Randolph Dr.
Chicago, IL 60601

From: John E. Taylor, Jr., R-66376
Menard Correctional Center
P.O. Box 711
Menard, IL 62559

Dear ~~Atty. Porter~~

July 31, 2008

I am in need of legal representation for a §1983 Civil suit against Cook County Health Services (Cermak Health Services) and the employees who were involved in denying medication each time I went to Court, and/or Stroger's Hospital.

According to what a lawyer told me, my Fourteenth Amendment: Due Process rights and First Amendment right to petition, were violated, due to the discovery of a pending Civil suit at the time of contact of a doctor.

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Thankyou for any consideration given. If you can't represent me, will you please recommend someone who may be willing to represent me.

Sincerely,

John E. Taylor

Copy

To: Nicole F. Sommerfield, Attorney
Jerome Foreman & Associates
640 N. LaSalle St., Ste. 556
Chicago, IL 60610

From: John E. Taylor, Jr., R-66376
Menard Correctional Center
P.O. Box 711
Menard, IL 62559

Dear ~~Atty.~~ Sommerfield

July 31, 2008

I am in need of legal representation for a §1983 Civil suit against Cook County Health Services (Cermak Health Services) and the employees who were involved in denying medication each time I went to Court, and/or Stroger's Hospital.

According to what a lawyer told me, my Fourteenth Amendment: Due Process rights and First Amendment right to petition, were violated, due to the discovery of a pending Civil suit at the time of contact of a doctor.

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Thankyou for any consideration given. If you can't represent me, will you please recommend someone who may be willing to represent me.

Sincerely,